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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 21-mc-_____

v.

STEVEN SEAGAL,

Defendant.

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT OF
APPLICATION TO ENFORCE A COMMISSION ORDER**

Maureen Peyton King declares under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a Senior Trial Counsel employed by the Securities and Exchange Commission (the "Commission") in its New York Regional Office. I am over 18 years old and am personally familiar with the facts set forth herein.
2. I make this declaration in support of the Commission's request for the issuance of an order to show cause on the Commission's Application to Enforce a Commission Order (the "Application").

3. On February 27, 2020, the Commission entered an order against Steven Seagal, Admin. Proc. File No. 3-19712 (the “Order”). A copy of the Commission Order is attached hereto as Ex. 1.

4. The Order found that Seagal touted on social media a security that was being offered and sold in an initial coin offering (“ICO”) without disclosing, in violation of the federal securities laws, that the issuer was paying him for the promotions. *Id.*

5. At that time, Seagal had approximately 107,000 Twitter followers and 6.7 million Facebook followers. *Id.*

6. Seagal’s failure to disclose the compensation he received for touting the ICO violated Section 17(b) of the Securities Act of 1933, which makes it unlawful for any person to promote a security without fully disclosing the receipt and amount of such consideration. *Id.*

7. Seagal offered to settle with the Commission. As part of the offer, attached here, Seagal waived, among other things, “Judicial Review by any court.” King Decl. Ex. 2, Part V.

8. The Order required Seagal to pay, pursuant to an installment plan, disgorgement of \$157,000, prejudgment interest of \$16,448.76, and a civil money penalty in the amount of \$157,000. *Id.*

9. The installment plan required periodic payments over 330 days. Ex. 1.

10. Seagal has paid only \$75,000 toward the Judgment.

11. As Defendant plans to sell real property at a reported price of \$3.4 million, the need for a Judgment is particularly urgent. A copy of the article referencing the sale is attached as Ex. 3.

12. Seagal resides in Russia. Ex. 1.

13. Seagal's attorney in the SEC case ended his representation and instructed the SEC team to send letters and communications to Seagal via Alan Tivoli, Seagal's business manager at the following email address: ativoli@otpmgt.com.

14. Tivoli's contact information indicates that OPTGMT is in California. A copy of the contact information is attached as Ex. 4.

15. On June 2, 2021, the Commission emailed notice that it intends to institute an action seeking a Judgment to Seagal to: ativoli@otpmgt.com.

16. A Proposed Order to Show Cause is attached as Ex. 5.

17. A Proposed Judgment is attached as Ex. 6.

18. Seagal's touts, which linked to related defendants' false and misleading statements were made to the public at large in this District and several victims of Defendants' fraudulent conduct reside in, and invested in Bitcoin2Gen from within, this District. *See SEC v. Krstic, et al.*, 21-cv-529 (E.D.N.Y.).

19. No prior application for this or similar relief has been made to any court or judge.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Wantagh, New York, on June 15, 2021.

s/Maureen Peyton King
Maureen Peyton King